

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Rico Mendoza)
)
)
Plaintiff,)
)
)
-vs-)
) (jury demand)
Cook County Sheriff's Police Officer)
Joseph Bennett, #10345 and Cook)
County Sheriff's Police Officer Doe,)
#10550,)
)
Defendants.)

COMPLAINT

Plaintiff, by counsel, alleges as follows:

1. This is a civil action arising under 42 U.S.C. §1983. The jurisdiction of this Court is conferred by 28 U.S.C. §1333.
2. Plaintiff Rico Mendoza is a resident of the Northern District of Illinois.
3. Defendant Cook County Sheriff's Police Officers Joseph Bennett, #10345 and Doe (who true surname is currently unknown to plaintiff), #10550 are sued in their individual capacity.
4. In July of 2012, defendants arrested plaintiff.
5. Defendants used excessive and unreasonable force in the course of arresting plaintiff.

6. As a result of the foregoing, plaintiff incur serious personal injuries and was deprived of rights secured by the Fourth and Fourteenth Amendments to the Constitution of the United States.

7. Plaintiff hereby demands trial by jury.

Wherefore plaintiff requests that judgment be entered against defendants for appropriate compensatory damages in an amount in excess of seventy-five thousand dollars.

/s/ Kenneth N. Flaxman
KENNETH N. FLAXMAN
ARDC No. 830399
200 S Michigan Ave Ste 201
Chicago, IL 60604-2430
(312) 427-3200
Attorney for Plaintiff